

May 14, 2021

**Via CM/ECF**

Hon. Lorna G. Schofield  
United States District Court  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: 21-cv-2351-LGS, *Alexander v. Habib Bank Limited*, Request for Adjournment  
of Initial Case Management Conference

Dear Judge Schofield,

I represent the plaintiffs in this action and write to respectfully move, pursuant to your honor's Individual Rule of Practice I.B.2, for an adjournment of the initial case management conference currently scheduled for June 3, 2021, at 10:50 AM. This is the first request for adjournment. An adjournment is warranted because, for reasons beyond our control, we have not been able to complete service or reach defense counsel.

This case has been designated a related case to 20-cv-4322-LGS, *King v. Habib Bank Limited*, a case that arises out of the same course of conduct by the same defendant, but involves different plaintiffs. As the Court is aware, in *King*, we have been attempting to serve the complaint as required by the Hague Convention on the Service Abroad of Judicial or Extrajudicial Documents in Civil or Commercial Matters. We are following the same procedure in this case, and encountering the same delays. Specifically, delivering documents to the Pakistani Ministry of Law and Justice (the Central Authority in Pakistan responsible for carrying out requests for service) has been difficult, and the Ministry has not been responsive to our attempts to obtain clarification about when service might be completed. We are in the process of retaining counsel in Pakistan who can hopefully provide more clarity about the situation—for both *King* and for this case.

In *King*, the Court entered an order on September 16, 2020, adjourning the initial case management conference *sine die*, and requiring us to provide notice every 30 days of the status of attempts to effect service, or within 2 days if service was

completed, or the defendant otherwise made contact. I respectfully request that a similar order be entered in this case, because the process for perfecting service (or otherwise obtaining a response) will be identical in both cases. If the Court is agreeable, I recommend that letters updating the Court be filed in both cases on the same schedule.

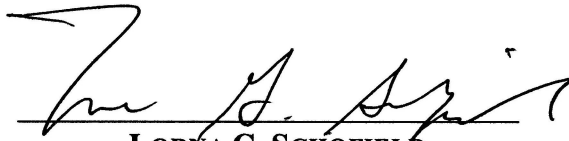
Respectfully submitted,

s/Tejinder Singh

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Plaintiffs' application is **GRANTED**. The initial pretrial conference scheduled for June 3, 2021, is **adjourned sine die**. Plaintiffs shall file a status letter on service and communication efforts by **June 15, 2021**, and every 30 days thereafter. If service is completed or Plaintiffs are in communication with Defendant in between status letter deadlines, Plaintiffs shall file a status letter within two business days of the event.

Dated: May 17, 2021  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**